

The Commission's rules, as recommended by Local Governments in Attachment B, should allow subscribers to receive credits for cable service in the event the cable operator fails to keep a scheduled installation or service repair appointment,¹³ as several cable operators have agreed to do in jurisdictions listed in the chart attached hereto. The provisions for credit to cable subscribers provide significant incentives to cable operators to be prompt and not to unduly inconvenience subscribers.

Local Governments urge the Commission to ensure that the rules it adopts will be specific enough to ensure uniformity and ease of compliance and enforcement by cable operators and local franchising authorities, respectively.

4. Administration by Local Franchising Authorities

In the NPRM, the Commission seeks comment on whether it is appropriate for local authorities to be responsible for setting time frames in which to comply with standards, oversee compliance and determine how

¹³ Local Governments urge the Commission to consider the implications for a subscriber if a cable operator fails to keep a scheduled installation or service repair. Often a subscriber takes time off work to meet the installer or repair person. A credit for cable service is very little compensation for the amount of time and frustration experienced by a cable subscriber in those circumstances.

compliance should be measured, establish penalties for violations of the standards or impose specific billing and collection procedures.

Local Governments believe that it is not only appropriate but essential for local franchising authorities to be responsible in these areas. Such an approach is consistent with local franchising authorities' historic and continuing role in overseeing the franchising process and the cable operator's compliance with the terms and conditions of the franchise. This role is contemplated by the Cable Act in other key areas, such as renewal¹⁴. As a practical matter, most franchises establish penalties for violations of provisions of the franchise, which include a cable operator's obligation to comply with applicable law. And many franchises contain default and revocation provisions for a cable operator's failure to so comply. It is imperative that franchising authorities continue to have these remedies available, and be able to

¹⁴ Section 626(c)(1) of the 1984 Act allows a cable operator to consider whether the "cable operator has substantially complied with the material terms of the existing franchise and with applicable law." In addition, Section 626 of the 1984 Act directs local franchising authorities to consider at renewal whether the "quality of the operator's service, including . . . response to consumer complaints and billing practices . . . has been reasonable in light of community needs." 47 U.S.C. § 626(c)(1)(B).

exercise such remedies if a cable operator fails to meet its customer service obligations.

B. Relationship of Commission Standards to Other Provisions of 1992 Act

In the NPRM, the Commission seeks comment on the impact of the billing refund provisions in Section 8 of the 1992 Act on other provisions of the 1992 Act, specifically the rate rollback and refund provisions in Section 3 and the subscriber bill itemization provision in Section 14 of the 1992 Act.

Local Governments believe that the customer service standards adopted by the Commission pursuant to Section 8 can easily be administered in a manner consistent with the regulations established pursuant to Section 623(C)(2)(c) of the Communications Act, as amended by the 1992 Act, regarding rollbacks and refunds of rates for cable programming services. The Commission should ensure that its rate regulation rules as well as its consumer protection standards will enhance the local franchising authorities' ability to fashion a wide range of remedies with maximum discretion to ensure that the purposes of the 1992 Act are realized. Similarly, the customer service standards established by the Commission should allow franchising authorities maximum discretion to impose specific billing and refund procedures. The customer service standards and procedures to be

established by the Commission do not constitute rate regulations and should not be limited by the rules promulgated by the Commission pursuant to Section 3 of the 1992 Act.

At the same time, however, the Commission standards adopted pursuant to Section 8 of the 1992 Act should address more than rollbacks and refunds of rates. Section 8 requires the Commission to establish requirements governing communications between the cable operator and the subscriber regarding standards governing billing and refunds; this mandate is considerably broader than the requirement in Section 3. The Commission standards adopted pursuant to Section 8 should include, but not be limited to, provisions addressing billing dispute procedures and requiring a minimum time frame after which a bill has become overdue before which a late charge may be imposed, limitations on the amount of late charges and credits for service outages and missed service calls.

With regard to subscriber bill itemization, which is permitted by Section 622(c) of the Communications Act, as amended by the 1992 Act, Local Governments urge the Commission to adopt customer service requirements to ensure that subscribers have full, complete and accurate information.

Often cable operators characterize franchise fees payable to local franchising authorities on a subscriber's bill as a tax levied on the subscriber's service by the franchising authority, as opposed to a percentage of the cable operator's gross revenues received in connection with its operation of the cable system in the particular jurisdiction. Local Governments believe that this type of presentation on a subscriber's bill is extremely misleading.

Local Governments must be authorized to review subscriber bills to ensure that the information provided to subscribers is not misleading. Local Governments urge the Commission to adopt consumer protection standards to ensure that cable operators itemize each service and/or equipment provided to a subscriber and that all aspects of a subscriber's bill, including the itemization of those amounts permitted by the 1992 Act to be itemized, be direct, clear, easily understandable, and not misleading.¹⁵

¹⁵ Attached as Attachment C to these comments is a Statement of Policy issued by the New York State Commission on Cable Television ("CCT") addressing this issue in detail. The CCT recently proposed adopting a rule to prohibit the practice of characterizing franchise fees on subscribers' bills as a direct charge levied on subscribers. See Notice of Proposed Rulemaking released November 14, 1992 in Docket No. 90389-A.

C. Minimum Service Ranges Approach

Local Governments urge the FCC not to adopt minimum service obligations based on certain characteristics of a cable system or service ranges within which franchising authorities and cable operators may negotiate. First, such an approach would not be consistent with the statute. Under the 1992 Act, a franchising authority may establish standards that exceed those established by the Commission. A "range" approach suggests a Commission-controlled "upper" limit.

Second, as discussed in Section II.A.1 of these comments, it is crucial for the Commission to adopt a reasonably strong set of specific protection standards to ensure cable subscribers a high quality level of cable service. A range of minimum service obligations would not adequately ensure that cable subscribers receive an acceptable level of service and it would require each of the 8,000 or so franchising authorities to hold hearings to determine which specific rules to adopt.

Third, as discussed in Section II.E of these comments, under the 1984 Act, franchising authorities could establish and enforce customer service standards. Yet, as Congress noted in the legislative history of the 1992 Act, customer service is a significant problem. If

the Commission were to adopt a "minimum" approach, the result would likely be that customer service would continue to be a significant problem and that one of the key purposes of the 1992 Act would not be effectuated.

D. Benchmark Approach

Local Governments urge the Commission to establish a tough benchmark of customer service standards that cable operators must be required to meet. The requirement that the cable operator would be required to adhere to the Commission standards would be subject to the three exceptions described above: e.g., the franchising authority determines to waive the FCC standards in favor of less stringent standards; more stringent standards are already in place; or a franchising authority promulgates more stringent or different standards. Such an approach -- following a single benchmark of standards, but subject to the enumerated exceptions -- would allow the Commission's standards to be tailored to meet the needs of local communities by the local community, where appropriate. It would also allow those entities in the best position to determine those needs -- local franchising authorities -- the ability to enforce and waive, if necessary, the federal requirements, with ultimate oversight authority resting with the Commission.

In the NPRM, the Commission also seeks comments on whether an escalating benchmark that would increase the "service minimums" over time is appropriate. Local Governments strongly urge the Commission not to adopt such an approach in its rules. Such an approach is a variation of the service minimums approach, which Local Governments do not believe will ultimately ensure a high quality level of customer service. Such a transition by federal fiat is not necessary.

Instead, the Commission may wish to consider a transition period during which the Commission standards become applicable to cable systems. One approach may be that the Commission rules would allow franchising authorities to grant, for a limited duration, based upon a showing of need by the cable operator, waivers of the applicability of specific rules until such time as the cable operator can comply with such rule(s). Any such waiver should not exceed one year. Such an approach would provide flexibility, would not unduly burden cable operators, and would not compromise the purposes of the 1992 Act.

IV. CONCLUSION

The Local Governments believe the approach proposed herein will ensure high quality customer

service to cable subscribers throughout the country,
and, at the same time, will provide several mechanisms
to ensure that cable operators will not be unduly
burdened.

Respectfully submitted,

Norman M. Sinel

Norman M. Sinel
Patrick J. Grant
Stephanie M. Phillipps
Caroline H. Little
Bruce A. Henoch

Arnold & Porter
1200 New Hampshire Avenue, N.W.
Washington, D.C. 20036
(202) 872-6700

Counsel for
Local Governments

Date: January 11, 1993

ATTACHMENT A

CUSTOMER SERVICE STANDARDS

| FRANCHISING AUTHORITY | St. Louis, Missouri | Portland, Oregon | Los Angeles, California | Mt. Prospect, Illinois | Vancouver, Washington | Charlotte/Mecklenburg North Carolina |
|--|--|--|--|--|---|---|
| STANDARD | | | | | | |
| Customer Service Representatives (Working hours) | At least 12 customer service representatives available from 8:00 a.m. to 5 p.m. | Offices must be staffed a minimum of 50 hours per week, with at least 9 hours per weekday and 5 hours per Saturday. | Office must be able to respond to consumers a minimum of 54 hours per week. | Listed number should be available at all hours of day and night. | Must have toll-free number, and must be answered 24 hours a day. | Must have local telephone number available 24 hours a day, 7 days a week. |
| Customer service Representatives (after hours) | 2 customer service representatives available from 5-7 p.m. and 8 a.m. - 5 p.m., Saturdays. Answering service other hours; service will notify technician if outage occurs. | Toll-free lines answered 24 hours either by staff or by answering service. | Telephone lines either adequately staffed or with answering capability, providing at least emergency referral information operational 24 hours a day. | | Must be answered 24 hours per day. | Telephone service must be available 24 hours a day, seven days a week. |

| FRANCHISING AUTHORITY | St. Louis, Missouri | Portland, Oregon | Los Angeles, California | Mt. Prospect, Illinois | Vancouver, Washington | Charlotte/Mecklenburg North Carolina |
|---|---|---|--|--|--|---|
| STANDARD | | | | | | |
| Telephone service time requirements | Hold time - less than 3 minutes. Abandonment rate - less than 20%. Busy signals - less than 15%. | Must have at least 90% responsiveness to calls at normal calling volume, meaning only 10% busy signal or delay over 1 minute. | Calls must be answered on average within 30 seconds 90% of time. Busy signals may be received a maximum of 3% of the time. | All calls answered in 4 rings by person or machine. Maximum 2 minutes hold. Abandonment rate of no more than 10%. | Minimum number of busy signals or delays possible. | 85% of all calls answered within 2 minutes. Not more than 15% of calls on hold over 30 seconds shall be lost. |
| Walk-in office hours | Must be conveniently located, and open 8 a.m. to 7 p.m. weekdays, and 8 a.m. to 5 p.m. Saturdays | Office must be open at least 50 hours per week, with at least 9 hours per weekday and 5 hours per Saturday. | Franchise office must be able to respond to customers a minimum of 8 hours per weekday and 4 hours on Saturday. | | Must have office open minimum 40 hours per week, staffed so that customers will not wait more than 15 minutes. | Must have a business office open 8 a.m.-6 p.m. Monday - Friday, Saturday 9 a.m.-6 p.m. |
| Customer complaint and service handling reports. | Cable operator must prepare monthly reports, including average on-hold time, abandonment percentage, and total calls per month. | Per franchises, cable operator's annual reports must summarize complaints and telephone response statistics. | | Cable operator must prepare summary of service calls and actions taken annually. Monthly report on phone calls must be provided. | | Cable operators must prepare an annual report on number of phone lines, time in which calls are answered, and percentage of calls lost. |
| Customer service representative/employee identification | | | During construction, all construction personnel and equipment shall be clearly identified with the name and telephone number of the franchisee and any subcontractors. | Cable operators must identify themselves by name, and technicians must wear badges. | | |

| FRANCHISING AUTHORITY | St. Louis, Missouri | Portland, Oregon | Los Angeles, California | Mt. Prospect, Illinois | Vancouver, Washington | Charlotte/Mecklenburg North Carolina |
|---------------------------------------|--|---|---|---|---|---|
| STANDARD | | | | | | |
| Handling of service calls | Must be investigated within 24 hours and resolved as promptly as possible. | Must be acknowledged within 24 hours. Service interruption repairs must be completed within 24 hours and all other calls within 72 hours. No charge allowed for repair work unless subscriber neglects or abuses equipment. | Requests must be acknowledged within 24 hours. Verification, and if possible, resolution, must occur within 48 hours, but in any case resolution must be completed within 1 week. | Action must be taken on all non-major calls the next business day and repairs completed within 48 hours. Action on major problems must be commenced immediately. | Must be acknowledged within 48 hours, off premises repairs must be completed within 24 hours; all others within 72 hours. No charge allowed in absence of subscriber negligence or abuse. | All repair calls must be responded to within 24 hours either by telephone or by a visit to the premises. Company must resolve 80% of all repair calls within 48 hours. |
| Service call scheduling | Appointments must be scheduled morning, afternoon or all day. | Appointments must be made either at a specific time or within a 4 hour block. | Appointments must be made within 4 hour blocks. | Subscriber must be told whether appoint- ment is in "a.m." or "p.m." | Appointments must be made either at a specific time or within a 4 hour block. | Company must notify if call is to be made in morning, afternoon or evening. |
| Credit for missed service calls | | | If company misses a service appointment, the subscriber must receive a \$10 credit upon subscriber request. | | | |

| FRANCHISING AUTHORITY | St. Louis, Missouri | Portland, Oregon | Los Angeles, California | Mt. Prospect, Illinois | Vancouver, Washington | Charlotte/Mecklenburg North Carolina |
|--|--|---|--|---|--|---|
| STANDARD | | | | | | |
| Service interruption for system repair | To extent possible, work is to be performed between 4 a.m. and 6 a.m. | | Interruptions greater than 4 hours may be scheduled only after city and subscribers have been given 48 hours notice. | Any service may be interrupted for repair between 1 a.m. and 7 a.m. unless notification given 24 hours ahead of time. | | Should be done in early morning. |
| Service of outages | Repairs must be made 24 hours a day, 7 days a week. | Repairs of service interruptions must be completed within 24 hours under normal operating procedures. | | Outages reported before 9 p.m. must be handled that day. Outages reported after 9 p.m. must be repaired within 24 hours beginning the next morning. | | Company must dispatch technicians to outages immediately during business hours and within within 30 minutes at other times. |
| Credit for service outages | Credit given for outages lasting more than 24 hours. | On customer request, pro-rated 24 hour credit given for any outage of 4 hours or more. | Pro-rated credit automatically given for any outage of 24 or more consecutive hours. On customer request, 1 day's credit given for any outage of greater than 4 hours in a 24 hour period. | Credit given for each loss of 24 hours of service. | 24-hour credit must be provided for any outage of at least 4 hours or more in one day. | Pro-rated rebate given based on length of outage for any outage of 24 or more consecutive hours. |
| Credit for reception problems | Credit given based on type of trouble. Generally, full credit given for affected period. | | | | | |

| FRANCHISING AUTHORITY | St. Louis, Missouri | Portland, Oregon | Los Angeles, California | Mt. Prospect, Illinois | Vancouver, Washington | Charlotte/Mecklenburg North Carolina |
|--|--|-----------------------------|---|--|----------------------------------|--|
| STANDARD | | | | | | |
| Installation scheduling and priorities | Company must adhere to following priorities: 1) service change for existing subscribers. 2) Disconnection for existing subscribers. 3) Installation for new subscribers. | | Installation must be made within 9 calendar days of customer request, or company must give customer a \$10 credit upon request. | All requests for installation shall be completed within 10 days of the request. | | Company must install cable service and provide requested service changes to existing customers within 10 business days of the original request. |
| Billing and billing disputes | 2 cycles beginning on 1st and 16th of month. Late fee assessed if payment not received by cut-off date. | Bills must be itemized | | Bills must be sent monthly. | Bills must be itemized. | In cycles; monthly in Mecklenburg County. Company must provide information on billing annually to customers, and must give 30 days prior notice of any changes to the billing process. |
| Late charges | Company may impose a late fee for bills not paid by due date. | | | Late payment charges must be clearly stated on bills and must be included as part of information provided to subscribers. | | |

| FRANCHISING AUTHORITY | St. Louis, Missouri | Portland, Oregon | Los Angeles, California | Mt. Prospect, Illinois | Vancouver, Washington | Charlotte/Mecklenburg North Carolina |
|--|--|--|--|--|--|---|
| STANDARD | | | | | | |
| Resolution of service-related disputes | | Company must semi-annually provide notification to all customers that they may refer unresolved disputes to the City Cable Office. | The company, at least twice a year, must give written notice that the city telecommunications department will address complaints not satisfactorily handled by the company. Department checks notice prior to forwarding to subscribers. | Cable Agency may investigate unresolved complaints and may order corrective action as appropriate. | | Company must respond to complaints within 7 days. The city may review and monitor unresolved customer complaints. |
| Involuntary disconnection | Accounts 45 days overdue are disconnected. Company must provide two notices prior to disconnection, 15 days and 10 days prior to date service can be disconnected. | Accounts 30 days overdue with minimum 10 days notice; or if subscriber tampers with equipment. | | | Accounts 30 days overdue, with minimum 7 days notice; or if customer tampers with equipment. | Company must provide 7 days' notice prior to disconnection. |

| FRANCHISING AUTHORITY | St. Louis, Missouri | Portland, Oregon | Los Angeles, California | Mt. Prospect, Illinois | Vancouver, Washington | Charlotte/Mecklenburg North Carolina |
|--|--------------------------------|---|--|--|--|--|
| STANDARD | | | | | | |
| Voluntary disconnection | | No notice to company required. No charge allowed and deposit must be returned within 10 working days. Company may either pick up equipment or provide postage prepaid mailers. | Company must refund all surpluses on account within 45 days after disconnection or give \$10 to subscriber in addition to surplus. | Customer may request disconnection at any time without charge. Disconnection must occur as soon as possible, but no later than 30 days following the request. | No notice to company required, and no charge allowed. Refund of deposit must be made within 45 days after all equipment returned. Replacement of equipment must be made at the subscriber's residence by the next working day. | No charge allowed, and must be disconnected within 15 days of request. Any refunds due must be paid within 60 days of termination date. |
| Notice of rate changes or programming changes or deletions | | 10 days notice to city and subscribers of programming changes or deletions, or of rate increases. | 30 days notice must be given for rate changes or channel scrambling, realignment, or deletions. | | At least 10 days notice to customers of programming changes or deletions, and 30 days' notice to customers of late increases. | Any change in programming or services must be reported to the city at least 30 days prior to implementation. |
| Provision of cable service information to customers | | Upon installation, company must provide customer with service and rate information and semi-annually send notice of complaint procedures. | Before installation, company must provide information on rates, notices, and procedures for resolving complaints. | Company must provide information on billing and service complaint mechanisms. | Company must upon installation provide information on company policies. | Company shall provide all subscribers with complete information on services and rates. |

| FRANCHISING AUTHORITY | St. Louis, Missouri | Portland, Oregon | Los Angeles, California | Mt. Prospect, Illinois | Vancouver, Washington | Charlotte/Mecklenburg North Carolina |
|--|--------------------------------|---|--|---|---|---|
| STANDARD | | | | | | |
| Distribution of promotional materials to subscribers | | All pay-per-view and other promotional materials must clearly disclose price terms. | | Promotional materials must include costs and terms of the described promotions. | | |
| Services to disabled people | | Must provide necessary facilities, including TDD/TTY and remote control. | Company must provide remote control devices to disabled persons, and must utilize TTD equipment. | | Must provide necessary facilities including TDD/TTY and remote control. | |

| | | | | | | |
|----------------------------------|------------------------|---------------------|----------------------------|---------------------------|--------------------------|---|
| FRANCHISING AUTHORITY | St. Louis, Missouri | Portland, Oregon | Los Angeles, California | Mt. Prospect, Illinois | Vancouver, Washington | Charlotte/Mecklenburg North Carolina |
|----------------------------------|------------------------|---------------------|----------------------------|---------------------------|--------------------------|---|

STANDARD

MISCELLANEOUS STANDARDS

| | | | | | | |
|---------------------------------|--|--|--|--|--|---|
| Customer surveys and research | | Per franchises, company must conduct customer satisfaction surveys (city also does annual survey). | | Company must conduct customer satisfaction surveys. | | Company must research customer needs on an ongoing basis. |
| Service technician availability | Available 8 a.m. - 7 p.m., Monday - Friday, and 8 a.m. - 5 p.m., Saturdays. On-call for outages 24 hours a day, seven days a week. | Service and repairs must be completed in 24 to 72 hours. | Must be available 24 hours a day, 7 days a week for cable-related emergency repairs and maintenance. | Company must maintain a maintenance service capable of locating and repairing malfunctions at all hours. | | |

CUSTOMER SERVICE STANDARDS

| FRANCHISING AUTHORITY | Sacramento, California | District of Columbia (Proposed) | Manhattan, New York | New York State | NCTA SUGGESTED STANDARDS |
|--|--|--|---|--|---|
| STANDARD | | | | | |
| Customer Service Representatives (Working hours) | 24 hour toll-free access required with customer service representatives. Company with less than 30,000 customers can use an answering service. | Must have local telephone numbers answered 24 hours a day, 7 days a week. The lines may be answered by a service or automated response service. | Local number, answered 24 hours a day, 7 days a week. Can be answered by a service outside normal business hours. | Companies must have a telephone number to which subscribers may direct telephone calls. If trouble calls must be made outside of the local dialing area, the calls must be toll-free. | Company representatives must respond to telephone inquiries Monday-Friday during normal business hours. |
| Customer service Representatives (after hours) | Companies may use an answering service between midnight and 7 a.m. and on national holidays. | | Telephone number may be answered by a service outside of normal business hours. | | Systems will be staffed after hours based on community needs. |
| Telephone service time requirements | Answer time must not exceed 30 seconds, and busy signals should not occur more than 3% of the time. These standards should be met at least 90% of the time. | Calls answered in 4 rings. Lost calls not to exceed 4-1/2%. Maximum 30 second hold. Overflow device, triggered by no more than 20% of calls. | Company must maintain a state-of-the-art telephone system. Calls answered in 4 rings. Lost calls not to exceed 4-1/2%. Maximum 30 second hold. Overflow device for customers to leave messages triggered by a maximum of 20% of callers. | | Answer time not to exceed 30 seconds. Rings will be limited to four. Busy signals less than 3% of time. |

| FRANCHISING AUTHORITY | Sacramento, California | District of Columbia (Proposed) | Manhattan, New York | New York State | NCTA SUGGESTED STANDARDS |
|--|---|--|---|--|--|
| STANDARD | | | | | |
| Walk-in office hours | Company must have office open at least 9 hours per business day, and for companies with over 30,000 customers, at least 5 hours on the weekend. | Company must have one office in each city quadrant. These must be open 8 a.m.-7 p.m. weekdays and at least 5 hours on Saturday. | Service centers must be open 8 a.m. to 7 p.m. weekdays and at least 5 hours on Saturday. | | Centers must be open Monday-Friday during normal business hours. Companies will schedule additional hours based upon community needs. |
| Customer complaint and service handling reports | Company must provide quarterly telephone statistics on busy signals and response time. | Company must compile a monthly report of telephone efficiency, and monthly reports on repairs and outages handled. | Company must compile a quarterly report detailing customer service requests and telephone requests. | Reports on trouble calls must be filed by the companies. | |
| Customer service representative/ employee identification | Technicians, etc. must wear picture badges. All representatives must identify themselves by their names and/or identification numbers. | Employees who come to customers' residences must wear uniforms and picture identifications. Other company employees must wear name badges. | Employees who come to customers' residences must wear uniforms and picture identifications. Other company employees must wear name badges. | | |
| Handling of service calls | Complaints of poor quality must be responded to within 16 business hours. No charge permitted for service calls. | Calls must be returned within 1 business day. Reception problems must be corrected within 48 hours after complaint is received. No charge allowed. | Reception problems must be corrected within 48 hours after complaint is received. No charge for repair service is allowed. | Investigative action on trouble calls should be initiated the same day, but shall be initiated no later than the next business day. | General service problems must be responded to within 36 hours during the business week. |

| EXISTING AUTHORITY | Sacramento, California | District of Columbia (Proposed) | Manhattan, New York | New York State | NCTA SUGGESTED STANDARDS |
|---|---|--|--|--|---|
| STANDARD | | | | | |
| Service call scheduling | Company must respond to service call at either a specific time or within a four hour time block. | Service calls must be made within 5 hour segment. The company may not cancel any appointment less than 24 hours before the appointment time. | Appointments can be made in 5 hour blocks. The company may not cancel any appointment less than 24 hours before the appointment time. | Appointments must be made either for morning, afternoon, evening or Saturday. | Appointments must be scheduled during morning, afternoon, or all day. |
| Credit for missed service calls | For a failure to meet an appointment within the specified parameters, the company must, at the customer's discretion, give either credit for 1 month's free basic service or an opportunity to seek remedies under the California Code. | Failure to make a service call within specified 5 hour block entitles subscriber to credit for 1 month's service. | Failure to make a service call within specified 5 hour period entitles subscriber to credit for 1 month's service. | | |
| Service interruption for system repair | | Company must give at least 48 hours notice, and should not interrupt service except between 1 a.m. and 7 a.m. | Company must give notice of interruptions at least 48 hours in advance. | Companies must inform subscribers in advance of any scheduled service outage for equipment repair. | |
| Service of outages | System outages must be responded to within 2 hours, 24 hours a day. For isolated outages, response must be made within 8 business hours. | Outages must be corrected within 12 hours after the company learns of them. | Outages must be corrected within 12 hours after the company is notified. | | Service interruptions must be responded to promptly, in no case later than 24 hours. |

| FRANCHISING AUTHORITY | Sacramento, California | District of Columbia (Proposed) | Manhattan, New York | New York State | NCTA SUGGESTED STANDARDS |
|--|--|---|--|---|--|
| STANDARD | | | | | |
| Credit for service outages | Customer is entitled to 1 day's credit for each increment of 4 hour outage in excess of the first 4 hours of outage. | Outages lasting more than 4 hours in any 24 hour period entitle the customer to 1 day's credit. | Company must give credit for every outage lasting more than 4 hours in any 24 hour period or calendar day. | Companies must give credit for any outage in excess of 4 continuous hours. Such credit consists of 1 day's credit for each 24 hour period in which the outage continued for at least 4 hours. | |
| Credit for reception problems | | Subscribers with reception problems remaining unrepaired 48 hours after problem is reported are entitled to one day's credit. | Subscribers with reception problems remaining unrepaired 48 hours after the problem is reported are entitled to one day's credit for each 24 hour period in which the problem persists for at least 4 hours. | | |
| Installation scheduling and priorities | Installation must be performed within 7 business days after order is placed. | Installation must be completed within 7 business days after request is received. | Installation must be scheduled in 5 hour blocks within 8 business days of customer request. | | Installation must be performed within 7 business days after order is placed. |

| FRANCHISING AUTHORITY | Sacramento, California | District of Columbia (Proposed) | Manhattan, New York | New York State | NCTA SUGGESTED STANDARDS |
|--|---|--|---|---|--|
| STANDARD | | | | | |
| Billing and billing disputes | Bills must be itemized. | Bills must be itemized and sent monthly. The company must review billing disputes within 20 days. The customer may appeal the company's resolution of the dispute to the D.C. Cable Office. | Bills must be monthly and itemized. The company must review billing disputes within 20 days. The customer has 10 business days thereafter to file an appeal to the City Cable Office. | Bills must be itemized and must include the state cable commission's toll-free telephone number. Company must establish procedures for investigating billing disputes. Subscribers must be given 30 days from date of receipt to register their disputes. | Bills must be clear, concise and understandable. |
| Late Charges | Company may impose late charges for payments received after the due date of the bill. | Late fees not exceeding the maximum percent allowed by law may be applied to a delinquent bill. | Late fees not exceeding the maximum percent allowed by law may be applied to a delinquent bill. | Late charges may not be imposed until 45 days after the bill is mailed. | |
| Resolution of service-related disputes | | All complaints should be resolved as soon as possible, but no later than 7 business days after complaint is received. Acknowledgement of receipt of written complaint must be made within 2 business days. | All complaints should be resolved as soon as possible, but no later than 10 business days after the complaint is received. Acknowledgement of receipt of written complaint must be made within 2 business days. | Companies must provide the State Cable Commission with copies of any complaints received. Companies must annually provide written notice to cable subscribers of the complaint process. Companies must answer complaints within 20 working days of receipt. | |

| FRANCHISING AUTHORITY | Sacramento, California | District of Columbia (Proposed) | Manhattan, New York | New York State | NCTA SUGGESTED STANDARDS |
|--|---|--|---|---|--|
| STANDARD | | | | | |
| Involuntary disconnection | Company must first provide notice, at least 7 business days before disconnection if by mail, or 5 business days prior if in person. | Company may not disconnect until 5 days after customer is personally given notice, or 8 days after mail notice, of delinquency. Customer is considered delinquent 45 days after bill is mailed. | Company may not disconnect until 5 days after customer is personally given separate notice, or 8 days after mail notice, of delinquency. Customer is considered delinquent 45 days after bill is mailed. | Subscribers may only be disconnected if payment is delinquent 45 days after the bill is mailed, and only then after 8 days following mailed notice, or 5 days after personal notice, of impending discontinuance. | |
| Voluntary disconnection | Customer may request at any time. Company must pick up equipment within 7 business days of customer request. | | No fee may be charged. | No fee may be charged for disconnection or downgrades if customer discontinues or downgrades service after receiving notice of programming changes. | Refund checks must be issued no later than the earlier of 45 days or the customer's next billing cycle, if equipment has been returned to the company. |
| Notice of rate changes or programming changes or deletions | | Notice to city and subscribers must be given at least 30 days before any change in rates or programming. | Notice must be given to city and to subscribers at least 30 days before any programming or rate change. | Subscribers must be given notice of rate changes at least 10 days prior to the change. Subscribers must receive notice of programming changes at least 30 days prior to the change | Customers will be notified a minimum of 30 days in advance of any change in rates or channels. |

| FRANCHISING AUTHORITY | Sacramento, California | District of Columbia (Proposed) | Manhattan, New York | New York State | NCTA SUGGESTED STANDARDS |
|---|---|--|---|--|--|
| STANDARD Provision of cable service information to customers | Company must provide each customer with a general rate and programming disclosure at least once a year, and 30 days before any rate increase. | Company must provide programming and rate information annually to customers, and must also provide a subscriber handbook at the time of installation. | Company must provide programming and rate information annually to customers, and must also provide a subscriber handbook at the time of installation. | Cable companies must provide each customer with rate and programming information. This notice must be given to new customers and at least semi-annually thereafter. Notice of billing procedures must also be provided to new customers, and at least semi-annually thereafter. | Company must provide written information concerning rates and service policies to all subscribers at installation or upon request. |
| Distribution of promotional materials to customers | Company must retain copies for at least 1 year, and furnish copies to the City Commission upon request. | | | | |
| Services to disabled people | | Company must make remote control devices available to disabled people for a price not exceeding the company's cost. | Company must make remote control devices available to disabled people for a price not exceeding the company's cost. | | |